

C. Cotton Decl. Exhibit 16



December 31, 2025

VIA ELECTRONIC MAIL

Christopher V. Cotton

Donald D. Grubbs
Pulaski Kherker, PLLC
2925 Richmond Ave., #1725
Houston, TX 77098
dgrubbs@pulaskilawfirm.com

2555 Grand Blvd.
Kansas City, Missouri 64108
t 816.474.6550
dd 816.559.2393
f 816.421.5547
ccotton@shb.com

Dennis C. Reich, ESQ.
Andrew Holcomb, ESQ.
Reich and Binstock, LLP
4265 San Felipe, Suite 1000
Houston, TX 77027
aholcomb@reichandbinstock.com
dreich@reichandbinstock.com

Aimee H. Wagstaff
Wagstaff Law Firm
940 N. Lincoln St.
Denver, CO 80203
awagstaff@wagstafflawfirm.com

Re: *In re: Uber Technologies, Inc.*, No. 2:23-md-03084-CRB (N.D. Cal.)

Counsel:

I write to initiate a meet and confer regarding Plaintiffs listed in Attachment 1. PTO #5 requires each Plaintiff to "submit a bona fide ride receipt" from an Uber trip connected to the alleged incident. PTO #5, ¶ 4 (ECF 175). The listed Plaintiffs have been identified in association with a violation of PTO #5 regarding the production of a bona fide ride receipt. It is Defendants' position that these cases should be dismissed with prejudice and that a limited and narrowly tailored deposition of Plaintiff with MDL ID 4243 be permitted to investigate the origin of the fraudulent ride receipts.

I have included all law firms representing Plaintiff on Attachment 1 on this communication, as well as Plaintiffs' MDL leadership in the transmittal. Given the fast-moving nature of this docket and impending trials in this matter, it is imperative that we meet and confer on these issues promptly. I can make myself available most times this week to accommodate the group's schedules,



as well this coming Monday. Please provide your availability to meet and confer within this timeline.

Best regards,

A handwritten signature in blue ink that reads "Christopher V. Cotton". The signature is fluid and cursive, with "Christopher" on the first line and "V. Cotton" on the second line.

Christopher V. Cotton
Partner



ATTACHMENT 1

1. 3698 – Pulaski Law Firm, PLLC
2. 3700 – Pulaski Law Firm, PLLC
3. 4243 – Pulaski Law Firm, PLLC
4. 3879 – Reich and Binstock, LLP
5. 4142 – Reich and Binstock, LLP
6. 4097 – Wagstaff Law Firm
7. 4385 – Wagstaff Law Firm